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JUN 19 1998

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:)
)
Amendment of Section 73.202(b),) MM Docket No. 98-55
Table of Allotments, FM Broadcast Stations.) RM-9255
(Pleasanton, Bandera & Hondo, Texas))

TO: Chief, Allocations Branch

**REPLY COMMENTS OF
LA RADIO CRISTIANA NETWORK, INC.**

La Radio Cristiana Network, Inc. ("LRCN"), by its attorneys, hereby submits its comments in reply to the Comments and Counterproposal filed by North American Broadcasting Company ("NABC") in the above-styled proceeding on June 8, 1998.

1. NABC, in its Comments and Counterproposal, asks the Commission to amend the Table of Allotments by, *inter alia*, substituting Channel 251A for Channel 256A in Camp Wood, Texas. LRCN, as the permittee of FM radio broadcast station KAYG, is authorized to operate on Channel 256A in Camp Wood (FCC File No. BPH-970428ME).

2. LRCN supports the counterproposal of NABC. The counterproposal is in the public interest because, *inter alia*, the new allotment of Channel 251 to Camp Wood, Texas will allow LRCN to file an application on FCC Form 301 for a one-step upgrade to class C3. LRCN hereby commits to submit such an application and to construct KAYG as a Class C3 facility.

3. As shown by the attached engineering statement, the allotment of Channel 251C3 to Camp Wood will expand the predicted signal coverage contours of KAYG and allow its broadcasts to be received by many more listeners. When construction is completed, KAYG will not only provide a first local transmission service to Camp Wood, but reception service to a wider area

than would be possible if KAYG remains on Channel 256A. The proposed allotment on Channel 251, either as a Class A or a Class C3 allotment, is not short-spaced to any other Commission licensee or permittee, nor is it short-spaced to any Mexican allotment.

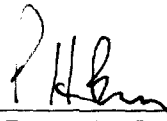
4. In addition to the public interest benefits set forth in the NABC proposal, the public interest will also be benefited by expanded service by KAYG in Camp Wood. No permittee or licensee will be harmed by this expanded service of KAYG.

5. Considering the foregoing, the Commission should adopt changes to the FM Table of Allotments as follows:

<u>City</u>	<u>Channel No.</u> <u>Present</u>	<u>Proposed</u>
Pleasanton, TX	252A	253C2
Bandera, TX	252A	256A
Camp Wood, TX	256A	251C3
Hondo, TX	235A	290A
Karnes City, TX	276C2	276C2
	(site restriction 16 km east)	(site restriction 5.9 km north)

Respectfully submitted,

LA RADIO CRISTIANA NETWORK, INC.

By: 
Barry D. Wood
Paul H. Brown

WOOD, MAINES & BROWN,
CHARTERED
1827 Jefferson Place, NW
Washington, D.C. 20036
(202) 293-5333

Its attorneys

June 19, 1998

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For: KAYG	FCC Database Date: 6/98	29-42-53
CAMP WOOD, TX	Channel Class: C3	100-00-56
City, State	Chan Class Freq kW Latitude Dist.	Required
Component	File Number HAAT Longitude Azm.	Clear (km)

>>>>>> Study For Channel 251 98.1 MHz <<<<<<<		
ANDERSON, TX	252 A 98.3	29-51-22 90.83 89
DING BROADCASTING	Docket-98-55	0 99-05-25 79.8 +1.83 CLOSE
ANDERSON, TX	252 A 98.3 1.65	29-51-22 90.83 89
MES G. WITHERS	BLH-910620KD 131	99-05-25 79.8 +1.83 CLOSE
to Mexico as B on 910620-Accepted by Mexico 920228		
ANDERSON, TX	252 A 98.3	29-51-22 90.83 89
DING BROADCASTING	Docket-90-466	0 99-05-25 79.8 +1.83 CLOSE
For Reconsideration-Denied by MO&O D90-466 1-9-98		
on for Review 2-6-98		
STIN, TX	251 C1 98.1 100.	30-13-24 218.6 211
ET BROADCASTING COM	BLH-900420KB 209	97-49-39 74.5 +7.6 CLOSE
N CARLOS, CI	248 C 97.5	29-01-45 114.7 96
	-	0 100-54-00 228.7 +18.7 CLEAR
d allotment limited to 100kw ERP @ 300m HAAT.		
N CARLOS, CI	252 A 98.3	29-01-45 114.7 88
	-	0 100-54-00 228.7 +26.7 CLEAR
EDRAS NEGRAS, CI	250 A 97.9	28-43-25 124.0 88
	-	0 100-36-02 207.5 +36.0 CLEAR
by Commission 940216		
REDO, TX	251 C1 98.1 96.	27-31-14 247.9 211
CARNATION A. GUERR	BLH-821108BB 213	99-31-19 168.7 +36.9 CLEAR

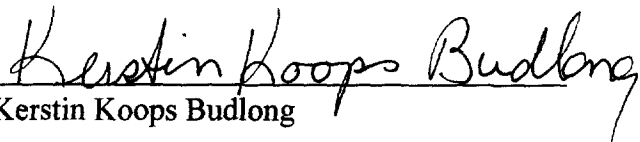
CERTIFICATE OF SERVICE

I, Kerstin Koops Budlong, hereby certify that on this date I caused the foregoing "Reply Comments of La Radio Cristiana Network, Inc." to be served by U.S. first class mail, postage prepaid, on the following:

Mark N. Lipp
Ginsburg, Feldman & Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036

Gene A. Bechtel
Bechtel & Cole, Chartered
1901 L Street, NW
Suite 250
Washington, DC 20036

Bruce A. Eisen
Kaye, Scholer, Fierman, Hays & Handler, LLP
901 15th Street, NW, Suite 1100
Washington, DC 20005


Kerstin Koops Budlong

Dated: June 19, 1998